

# EXHIBIT C

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TEXARKANA DIVISION

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GHJ HOLDINGS, LLC,  
Plaintiff,

Civil Action No. 5:11-CV-0035

v.

PENTAIR RESIDENTIAL FILTRATION, LLC  
and PURCELL MURRAY BUILDER SALES  
COMPANY, INC.,  
Defendants.

**DECLARATION OF DON  
CONNORS IN SUPPORT OF  
THE MOTION TO DISMISS  
FOR LACK OF PERSONAL  
JURISDICTION AND FOR  
ALTERNATIVE RELIEF  
OF TRANSFER**

-----X  
Don Connors, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am the Director for Purcell Murray Builder Sales Company, Inc. ("Purcell"). In that capacity, I am familiar with Purcell's distribution of residential water filtration products made by defendant Pentair Residential Filtration, LLC ("Pentair") as well as with the identity and location of documents and witnesses on the part of Purcell. I currently work at Purcell's offices in Brisbane, California and reside in Fremont, California. I make this Declaration in support of the motions made by Purcell and Pentair to dismiss insofar as Purcell seeks dismissal for lack of personal jurisdiction and for transfer of venue of this action to the Northern District of Illinois.

2. I have reviewed the Complaint and understand that Purcell and Pentair are being accused of falsely marking certain Pentair products with U.S. Patent Nos. 4,857,189 (the "'189 Patent") and 4,956,086 (the "'086 Patent"). The Complaint alleges that the '189 and '086 Patents are allegedly falsely marked on certain Pentair water filtration products including the Everpure® Water Filter Model Nos. QL2-OW200L ("Everpure water filter") and Cartridge Model Nos. H-50, H-54, H-104, H-300, and SPA-400 ("cartridges").

3. Purcell is a California corporation with its principal place of business in Brisbane, California.

4. Purcell has no offices or facilities in the State of Texas.

5. Purcell does not distribute or ship any Pentair products, including the products identified in the Complaint, into the State of Texas.


6. Purcell distributes Pentair residential water filter products only in the states of Arizona, California and Nevada. Purcell does not distribute the Everpure water filter in any other state.

7. Purcell plays no role in the design, manufacture, marking or packaging of the accused products. Therefore there is no individual at Purcell that would have any knowledge about these activities. There also is no individual at Purcell who would have knowledge of sales of these products in Texas because Purcell does not distribute or ship the accused products to the State of Texas. Kels Purcell who is located in Brisbane, California would have sales information about distribution of Pentair products in Arizona, California and Nevada.

8. Purcell does not do any business in the State of Texas.

9. The Complaint in this matter was personally served upon Don Connors at the Purcell office in Brisbane, California.

I declare under the penalty of perjury that the foregoing is true and correct. Executed on March 15, 2011.



Don Connors

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